

<p style="text-align: right;">Page 18</p> <p>1 Q. Over the course of your time on that</p> <p>2 website, did you come across women who were posting</p> <p>3 ads on Backpage who were at the United Inn and</p> <p>4 Suites?</p> <p>5 A. Yes.</p> <p>6 Q. Would they ever use the name United Inn or</p> <p>7 United Inn and Suites or the address of the hotel in</p> <p>8 their posts on Backpage?</p> <p>9 A. Once in a blue moon they'll put the name,</p> <p>10 but rarely. They normally get that information once</p> <p>11 they text you or call you and speak on the phone,</p> <p>12 they'll tell you the address and then tell you the</p> <p>13 name. But they normally don't post that in the</p> <p>14 description.</p> <p>15 Q. I wanted to ask you one other question</p> <p>16 about this report that we're looking at from</p> <p>17 August 12, 2015, which has been identified as</p> <p>18 Plaintiff's Exhibit 1. What gave rise to this</p> <p>19 prostitution operation in the first place, Sergeant</p> <p>20 King?</p> <p>21 A. At the United Inn?</p> <p>22 Q. Yeah. I mean, how was it that you and</p> <p>23 Schofield ended up investigating this prostitution</p> <p>24 at the United Inn as of August 12th, 2015?</p> <p>25 A. Well, United Inn is -- was one of the --</p>	<p style="text-align: right;">Page 20</p> <p>1 old, Sergeant King?</p> <p>2 A. Could be.</p> <p>3 MR. STORY: Object to form.</p> <p>4 BY MR. BOUCHARD:</p> <p>5 Q. I heard -- I didn't hear what you said,</p> <p>6 Sergeant King. Sorry.</p> <p>7 A. Possibility, yes, could be.</p> <p>8 Q. I said I had one more question, but I -- I</p> <p>9 realize I spoke too soon, about this report,</p> <p>10 Sergeant King. It says here that the -- the female</p> <p>11 on the passenger side, Tonisha Smith, waved her hand</p> <p>12 and exited out of the vehicle. But the prior</p> <p>13 sentence says that you and Officer Schofield</p> <p>14 observed a gray Honda Accord occupied by two females</p> <p>15 coming from the rear of the hotel. Did you ever</p> <p>16 figure out who the other female was who was in the</p> <p>17 car with Tonisha Smith?</p> <p>18 A. Possibly not, if it's not in the report.</p> <p>19 Maybe she could have been a friend dropping her off.</p> <p>20 She could have had another room there as well. It's</p> <p>21 a lot of females have different rooms in the hotel,</p> <p>22 so she could have been prostituting there as well</p> <p>23 but in a different room.</p> <p>24 Q. Just following up on what you just said, is</p> <p>25 it fair to say that there were a number of women, in</p>
<p style="text-align: right;">Page 19</p> <p>1 one of the problem hotels that we had in DeKalb</p> <p>2 County for drug and prostitution anyway, so it was</p> <p>3 like a radar hotel that we know about. Due to the</p> <p>4 fact that a lot of arrests were made, several</p> <p>5 arrests were made for narcotics and prostitution</p> <p>6 prior, for several years, at the hotel.</p> <p>7 And anytime that we get a female that we</p> <p>8 locate off of Backpage.com and they give us that</p> <p>9 address number, we immediately know the hotel, that</p> <p>10 it was United Inn.</p> <p>11 Q. So when you got that address, you didn't</p> <p>12 have to double-check and see where that was, you</p> <p>13 automatically knew that the United Inn and Suites?</p> <p>14 A. Absolutely, yes. Familiarized with those</p> <p>15 numbers, the addresses.</p> <p>16 Q. Because that's a hotel that you were aware</p> <p>17 had a high crime rate?</p> <p>18 A. Yes.</p> <p>19 Q. And the crime that you were aware of at the</p> <p>20 United Inn and Suites included drugs and</p> <p>21 prostitution?</p> <p>22 A. Yes.</p> <p>23 Q. Did you believe that some of that</p> <p>24 commercial sex that was occurring at the United Inn</p> <p>25 and Suites involves women under the age of 18 years</p>	<p style="text-align: right;">Page 21</p> <p>1 your experience, working at the United Inn and</p> <p>2 Suites doing commercial sex activities?</p> <p>3 A. Absolutely, yes.</p> <p>4 Q. And was that true during the entire period</p> <p>5 that you were a member of the vice unit from 2015 to</p> <p>6 2021?</p> <p>7 A. Yes.</p> <p>8 Q. Ms. Smith said in this fourth paragraph</p> <p>9 here, Sergeant King, that she could not locate her</p> <p>10 room key, and she said please don't leave, have to</p> <p>11 go to the front office to get another key."</p> <p>12 And Officer Schofield apparently replied,</p> <p>13 "Okay, not a problem." And it says she as and</p> <p>14 Tonisha Smith later walked back to the hotel room</p> <p>15 with a key and opened the door. Both Officer C.</p> <p>16 King and I proceeded to walk inside the hotel room."</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Was it your understanding that</p> <p>20 Tonisha Smith then went back to the hotel lobby and</p> <p>21 got a new key for the room?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. All right. I'm showing you what</p> <p>24 I've marked as Plaintiff's Exhibit 2 to your</p> <p>25 deposition, Sergeant King, which is Bates stamped</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 26</p> <p>1 sexual acts on a person for monetary gifts; could be 2 money, could be gift cards, could be getting a room 3 or whatnot. The pimp does, the pimp oversees all 4 that stuff, so once the prostitute performs those 5 acts, any monetary gifts or gifts that he or she 6 gets, she pass it on to the pimp, and the pimp take 7 possession of it. 8 Q. So the pimp gets some portion, or maybe in 9 some cases all that the prostitute earns from sexual 10 activity for money? 11 A. Yes. 12 Q. Are you familiar over the course of your 13 time in law enforcement in your work at the United 14 Inn and Suites, are you familiar with there being 15 pimps at the hotel who were working with prostitutes 16 at the hotel, sir? 17 A. Yes, absolutely. 18 Q. And so the pimps at the United Inn and 19 Suites, then, in your understanding, Sergeant King, 20 would have been collecting money from the 21 prostitutes that were working for them after those 22 prostitutes had made money from sex? 23 A. Yes. 24 Q. And I'm assuming when it says here that 25 Ms. Day, that is Daysheana Day, stated that</p>	<p style="text-align: right;">Page 28</p> <p>1 the pimp-prostitute issue that we were just talking 2 about. Were you familiar with there being pimps at 3 the United Inn and Suites specifically who were 4 overseeing multiple prostitutes? 5 A. Yes. 6 Q. Okay. Do -- do you recall the names of any 7 of those pimps? 8 A. No, I can't recall, remember the names of 9 them. 10 Q. Well, and again, it's not -- it's not a 11 memory test so it's fine if you don't remember, but 12 in the course of your work in the vice unit, you 13 were aware that there were pimps at the United Inn 14 and Suites who were -- 15 A. Yes. 16 Q. -- overseeing multiple prostitutes? 17 A. Yes. 18 Q. And again, when we talk about your time in 19 the vice unit, we're talking about 2015 to 2021. So 20 is that period -- is that period of time when you 21 were familiar with there being pimps at the United 22 Inn overseeing multiple prostitutes? 23 A. Yes. 24 Q. Okay. Taking you back to Plaintiff's 25 Exhibit 4, this is a report that you are on, sir,</p>
<p style="text-align: right;">Page 27</p> <p>1 Mr. Perry, her pimp, left, taking his suitcase and 2 proceeded to another female's room at the motel, we 3 don't know who this other female was, do we? 4 A. Let me see. Proceeded to another female's 5 room at the motel. Ms. Day stated that the room -- 6 I don't know who the other female was. 7 Q. Are you familiar, sir, from your time in 8 the vice unit, DeKalb County, working on human 9 trafficking and prostitution investigations with one 10 pimp having multiple women working for him at the 11 same time? 12 A. Absolutely, yes. 13 Q. In other words, one individual pimp could 14 have multiple hotel rooms with multiple women 15 working out of those hotel rooms, and he's earning 16 money from all of those women? 17 A. Yes. 18 Q. Sir, I'm going to show you what's been 19 marked as Plaintiff's Exhibit 4, which is Bates 20 stamped Plaintiff 1432 to 1433, and this is 21 Plaintiff's Exhibit 4. 22 (Plaintiff's Exhibit 4 marked) 23 BY MR. BOUCHARD: 24 Q. And before asking you some questions about 25 it, I just wanted to ask you something else about</p>	<p style="text-align: right;">Page 29</p> <p>1 and it's dated July 21, 2017. Do you see that? 2 A. Yes. 3 Q. And you see again incident location, 4649 4 Memorial, which is United Inn? 5 A. Yes. 6 Q. And the incident type is prostitution; 7 right? 8 A. Yes. 9 Q. The offender here is listed as somebody by 10 the name of Jessica Kenya Smith, who's 18 years old. 11 Right? 12 A. Yes. 13 Q. And Sergeant King, I wanted to ask you, 14 after you've had a chance to take a look at this 15 narrative, if -- if you could just sort of summarize 16 what happened in -- in this particular incident 17 report that's recorded here. 18 Have you had a chance to review it, 19 Sergeant King? 20 A. Yes. 21 Q. Do you mind just summarizing for me what -- 22 what happened here? 23 A. Looks like detective at the time was 24 Detective Johnson. He did the same thing as by 25 contacting a -- scrolling the Backpage.com website.</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 30</p> <p>1 Observed a black female posing most likely in nudity  2 and soliciting for sex. Made contact with her via  3 telephone. She stated that it's \$80 for 30 minutes  4 of sexual favors and to also bring a condom.  5 Johnson arrived at the location. The  6 female gave him the address, which is the 4649  7 Memorial Drive, United Inn hotel. Once he arrived,  8 she gave her room number of 132. Johnson went  9 inside the room, did the money exchange and  10 everything. Then he contact us, who was waiting  11 outside the vice unit. I was in a -- then we took  12 the female down into custody. That was my role on  13 this play here.  14 Q. Were you in undercover attire for this, or  15 were you in your uniform?  16 A. At this time I probably had my mask on with  17 a pullover vest that says Police. Plain clothes,  18 but we just put a vest on over our shirts and a mask  19 on our face.  20 Q. I wanted to ask -- go ahead, sorry.  21 A. And I also had a marked unit uniformed  22 personnel who be with me as well and we -- for the  23 presence of the police, to show that the police  24 presence was there.  25 Q. Do you remember how many officers were</p>	<p style="text-align: right;">Page 32</p> <p>1 task force unit to assist with it as well.  2 Q. And that --  3 A. Which is --  4 Q. Go ahead.  5 A. Which is the NET team, the Neighborhood  6 Enforcement Team.  7 Q. So the FBI was present for this operation  8 too?  9 A. Yes. I'm a part of the FBI, so we -- I  10 mean, they don't have to be there. I'm a part of  11 the FBI-Metro Atlanta Task Force Unit. So we have  12 two roles: I'm a vice unit vice detective at that  13 time, and I have credentials for the FBI for the  14 Metro Atlanta Children Exploitation Unit.  15 Q. Understood. And it says "conducted an  16 operation in reference to child and adult  17 prostitution." What does that mean, child and adult  18 prostitution?  19 A. We're doing a mass operation in reference  20 to combatting all human trafficking and  21 prostitutions, any -- any adult or underage  22 individuals that's in a human traffic operation. So  23 we try to find people that's probably 18 and under,  24 focus on that 18 and under in reference to when it  25 comes to the MATCH Task Force.</p>
<p style="text-align: right;">Page 31</p> <p>1 involved in this operation?  2 A. No. Look like it was the NET team, so it  3 could have been a minimum of probably three,  4 minimum.  5 Q. Well, let me ask you about that a little  6 bit more. It says in the second paragraph here, "On  7 July 20th, 2017, the DeKalb County Vice Unit and the  8 FBI Metro Atlanta Child Exploitation Task Force,  9 with help from the North Central Precinct  10 Neighborhood Enforcement Team, conducted an  11 operation in reference to child and adult  12 prostitution at 4649 Memorial Drive, United Inn and  13 Suites, Decatur, 30032."  14 I just want to sort of break that down with  15 you, Sergeant King, if we can. Why -- why would  16 there have been more than just the DeKalb County  17 Vice Unit? Like, why was the FBI have been  18 involved?  19 A. Like I said, we're a part of the MATCH Task  20 Force, which is the Metro Atlanta Child Exploitation  21 Task Force Unit for the FBI. Sometimes we conduct  22 operations, we do conduct operations that falls up  23 under the FBI. And so at that time the FBI was  24 present. And then whatever territory that hotel or  25 residence is at, we normally get the -- the precinct</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. And is 18 and under considered a minor  2 under the law?  3 A. Yes.  4 Q. And so is it fair to say in your experience  5 and training in law enforcement, Sergeant King, that  6 there's a difference between somebody who's over 18  7 engaging in commercial sex from somebody who's under  8 18 engaging in commercial sex?  9 A. Yes, absolutely. Actually, it's 17. So 17  10 and under now. Once you get 18, then it's adult.  11 Q. So if you're under 18, if you're 17, it's  12 considered to be a minor?  13 A. Yes.  14 Q. Do you recall what gave rise to this  15 operation regarding child and adult prostitution at  16 United Inn?  17 A. Backpage.com. Once you type in  18 Backpage.com, you can normally filter and put a --  19 pretty much of a location, so you type in Memorial  20 Drive, it would filter every ads that's posted in  21 the area of Memorial Drive.  22 Q. So if you went in Backpage.com around 2017,  23 July, and searched for Memorial Drive, it -- it  24 would sort of filter you down to the advertisements  25 from people who were around Memorial Drive and were</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 34</p> <p>1 selling sex?</p> <p>2 A. Yes.</p> <p>3 Q. Were you able to, in the course of that</p> <p>4 kind of an analysis of Backpage and the</p> <p>5 advertisements on Backpage, were you able to figure</p> <p>6 out there's a lot of advertisements coming from this</p> <p>7 area around United Inn and Suites?</p> <p>8 A. Yes, pretty much. Any advertisement that</p> <p>9 you normally get off of Memorial Drive, they</p> <p>10 normally nine out of ten used to be United Inn.</p> <p>11 Q. And there are a lot of hotels on Memorial</p> <p>12 Drive; right?</p> <p>13 A. Approximately, I think it's around about</p> <p>14 four or five, all the way down.</p> <p>15 Q. But you're saying most of the -- the</p> <p>16 commercial sex activity, in your experience, that</p> <p>17 was on Memorial Drive was at United Inn?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall -- in terms of what gave rise</p> <p>20 to this investigation about child and adult</p> <p>21 prostitution at United Inn, do you remember there</p> <p>22 being any complaints made to the DeKalb County</p> <p>23 Police Department from local business owners or</p> <p>24 citizens or -- or anybody else about this kind of</p> <p>25 activity at the hotel?</p>	<p style="text-align: right;">Page 36</p> <p>1 stroller inside the bathroom.</p> <p>2 A. Oh, I remember this case. Yes. Yes, we</p> <p>3 know her. I arrested her maybe two or three times</p> <p>4 after that too. Yeah, I'm familiar with this one</p> <p>5 all the way.</p> <p>6 Q. Okay. And do you recall whether you</p> <p>7 arrested her again at the United Inn and Suites or</p> <p>8 was it somewhere else?</p> <p>9 A. Another hotel in DeKalb. She got arrested</p> <p>10 with a female. Yes.</p> <p>11 Q. Okay, sir. I'm showing you what's been</p> <p>12 marked as Plaintiff's Exhibit 5, which is an article</p> <p>13 from the Atlanta Journal Constitution, and the</p> <p>14 headline is DeKalb News, extended stay hotel</p> <p>15 inspections lead to 2,397 citations.</p> <p>16 (Plaintiff's Exhibit 5 marked)</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And I wanted to ask you just a couple</p> <p>21 questions about this article. The first sentence in</p> <p>22 the article says "12 extended stay hotels in DeKalb</p> <p>23 County accumulated 2,397 code enforcement citations</p> <p>24 during 2018 according to a report provided to the</p> <p>25 county commission." Do you see that?</p>
<p style="text-align: right;">Page 35</p> <p>1 A. No.</p> <p>2 Q. So similar to the 2015 incident that we</p> <p>3 talked about, just to make sure I'm clear, Sergeant</p> <p>4 King, Ms. Smith, who's the subject in this report,</p> <p>5 was offering to have sex with a DeKalb County Police</p> <p>6 Officer who was undercover for money; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. And she was at the United Inn; correct?</p> <p>9 A. Yes.</p> <p>10 Q. And you participated in -- in the arrest;</p> <p>11 is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. And when you went into the hotel room, can</p> <p>14 you tell us what you saw?</p> <p>15 A. I don't remember what I saw at that time.</p> <p>16 Normally when you go in the room, you normally find</p> <p>17 a female, could be partially naked or could be fully</p> <p>18 naked. We take pictures. And then we'll locate our</p> <p>19 investigative funds money that the detective gave</p> <p>20 the female. Then we'll retrieve the money. Then</p> <p>21 we'll put that female into custody and take her</p> <p>22 downstairs and secure her inside a marked police</p> <p>23 vehicle.</p> <p>24 Q. Okay. This -- this mentions in the report</p> <p>25 that there was a female toddler sitting in a</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And then the next page says, "The</p> <p>3 worst offender was United Inn and Suites in Decatur,</p> <p>4 which paid \$60,345 in fines after receiving 447</p> <p>5 citations last year. It was among four hotels along</p> <p>6 Memorial drive that made the list." Do you see</p> <p>7 that?</p> <p>8 A. Yes.</p> <p>9 Q. Sergeant King, were you aware that the</p> <p>10 United Inn and Suites had received 447 citations in</p> <p>11 2018 from DeKalb County Code Enforcement?</p> <p>12 A. Not -- I didn't know, aware of the total</p> <p>13 amount of numbers, but I knew that all the hotels</p> <p>14 was getting cited for a lot of violations, several</p> <p>15 hotels, and I knew United Inn was one of them. But</p> <p>16 I didn't check up on the final numbers of how many</p> <p>17 citations was written.</p> <p>18 Q. Did you know that United Inn and Suites was</p> <p>19 the worst offender in terms of the volume of fines</p> <p>20 and the volume of citations?</p> <p>21 A. Didn't know that.</p> <p>22 Q. Does that surprise you, based on your time</p> <p>23 and experience at the United Inn and Suites?</p> <p>24 A. No, it doesn't surprise me.</p> <p>25 Q. Why do you say that?</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 46</p> <p>1 made arrangements for her to text me the address.  2 She texted the address as United Inn.  3 Once I arrived to the location, they gave  4 the -- the room number for 118. At that time I went  5 up to the Room 118, opened up the door. It's a  6 female who opened up the door, she was standing  7 behind the door. She was completely naked, and  8 there was another female directly in front of me who  9 had a jumpsuit on. I noticed both of the females  10 who pictures were posted on Listcrawler.com at that  11 time.  12 Made connections with them. Talked about  13 the money, exchanged for the money. At the time,  14 notified the units outside to come and take them  15 into custody. Upon taking them into custody, they  16 noticed there was a male hiding inside the bathroom.  17 He was taken into custody without incident, and  18 that's how he got charged for pimping.  19 Q. You mentioned Listcrawler.com, Sergeant  20 King. Is that a website like Backpage where you  21 advertise sex for money?  22 A. Yes. That's one of them. Several more  23 that we normally use, yes.  24 Q. And is Listcrawler another website that  25 young women would have been using to advertise</p>	<p style="text-align: right;">Page 48</p> <p>1 wanted to ask you about this e-mail from Steven  2 Coachman. Do you know Sergeant Coachman?  3 A. No.  4 Q. Okay. Well, he says here on March 9th,  5 with the subject line Operation Safe Guard, he said,  6 "This plan will be a daily initiative for all  7 shifts/units until further notice, at least the next  8 six weeks. There are eight stores and ten hotels  9 have been identified as target areas. We will focus  10 daily in these areas to reduce criminal activity.  11 Please list the address of the target location on  12 your PATS when you patrol the location. Example,  13 6201 Memorial Drive, Texaco; 4649 Memorial Drive,  14 United Inn. If you make any cases in the target  15 areas, citation or arrest, please advise your  16 supervisor so it can be entered on the daily  17 summary. Thank you for all your hard work and  18 dedication." Do you see that?  19 A. Yes.  20 Q. Okay. Are you familiar with Operation  21 Safeguard, Sergeant King?  22 A. Yes.  23 Q. Is that something that you were involved  24 with when you were part of the vice unit?  25 A. Sometimes we get involved, yes.</p>
<p style="text-align: right;">Page 47</p> <p>1 commercial sex at United Inn and Suites?  2 A. Yes.  3 Q. Did Listcrawler have a filter kind of like  4 Backpage did where you could focus on a particular  5 part of town or a particular area?  6 A. Yes, Listcrawler has it.  7 Q. So in other words, if you wanted to find  8 commercial sex around Memorial Drive, you could do  9 that on Listcrawler?  10 A. Yes.  11 Q. Okay. And was it true, in your experience,  12 Sergeant King, that if somebody was advertising for  13 commercial sex around Memorial Drive, nine times out  14 of ten they were at the United Inn and Suites?  15 A. Yes.  16 MR. STORY: Object to the form.  17 BY MR. BOUCHARD:  18 Q. Sergeant King, I'm showing you what's been  19 marked as Plaintiff's Exhibit 9 -- or 8, excuse me,  20 Plaintiff's Exhibit 8, which is Bates stamped  21 Plaintiff 31057 to 31058.  22 (Plaintiff's Exhibit 8 marked)  23 BY MR. BOUCHARD:  24 Q. Sergeant King, this is an e-mail chain from  25 some DeKalb County Police Officers, and I -- I</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. And were you aware that one of the target  2 locations under Operation Safeguard was the United  3 Inn and Suites?  4 A. Yes.  5 Q. Because there was a lot of crime there?  6 A. Yes.  7 Q. Okay. I want to show you what's been  8 marked as Plaintiff's Exhibit 9. And this is Bates  9 stamped Plaintiff 31059 to 31063.  10 (Plaintiff's Exhibit 9 marked)  11 BY MR. BOUCHARD:  12 Q. And sir, I just wanted to ask you a  13 question about the first page here and the second  14 page. First page refers to Operation Safeguard  15 Tucker Gas Stations/Stores/Motels Suppression. Do  16 you think suppression there is referring to  17 suppression of crime, or how do you interpret that,  18 Sergeant King?  19 MR. STORY: Object to form.  20 A. Suppression of crime.  21 BY MR. BOUCHARD:  22 Q. I wanted to read this sentence to you,  23 Sergeant King. It says, "An analysis of the top  24 eight gas stations/convenience stores and motels was  25 compiled to identify high crime locations." Do you</p>



## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 50</p> <p>1 see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And that was on page 31059, and then</p> <p>4 I want to go down to page 31060. Can you see it</p> <p>5 says Tucker Precinct Top Motels?</p> <p>6 A. Yes.</p> <p>7 Q. And it lists at the top of the list United</p> <p>8 Inn, 4649 Memorial Drive?</p> <p>9 A. Yes.</p> <p>10 Q. Can you read this paragraph for me,</p> <p>11 Sergeant King?</p> <p>12 A. "These locations have the highest crime</p> <p>13 rate within our business community. The Tucker</p> <p>14 Precinct will increase daily enforcement to reduce</p> <p>15 these crimes, increase trust and respect among the</p> <p>16 owners, managers, and -- and community members who</p> <p>17 shop or live at this location."</p> <p>18 Q. So is this a list of hotels in DeKalb</p> <p>19 County that have high crime rates?</p> <p>20 A. No, not in DeKalb County. That's in Tucker</p> <p>21 precinct area.</p> <p>22 Q. So this is a list of hotels in the Tucker</p> <p>23 precinct that have a high crime rate?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And which hotel is at the top of the</p>	<p style="text-align: right;">Page 52</p> <p>1 was, generally speaking, how the DeKalb County</p> <p>2 Police Department viewed the United Inn and Suites,</p> <p>3 that is as a hotel with a high crime rate?</p> <p>4 A. Yes.</p> <p>5 Q. And did the -- the crime that occur -- that</p> <p>6 occurred at the United Inn and Suites include</p> <p>7 commercial sex activity like prostitution and sex</p> <p>8 trafficking?</p> <p>9 A. Yes.</p> <p>10 Q. When it says here that the United Inn and</p> <p>11 Suites has a high crime rate and you -- you told me</p> <p>12 that operation safeguard was trying to suppress</p> <p>13 crime within Tucker precinct, was one of the crimes</p> <p>14 that the DeKalb County Police Department was trying</p> <p>15 to suppress at the United Inn and suites commercial</p> <p>16 sex crimes?</p> <p>17 A. Yes.</p> <p>18 Q. Sergeant King, we've looked at a number of</p> <p>19 different police reports now from 2015 through 2020.</p> <p>20 And I wanted to ask over those years, did you</p> <p>21 consider commercial sexual activity like</p> <p>22 prostitution and sex trafficking to be common at the</p> <p>23 United Inn and Suites?</p> <p>24 A. Yes.</p> <p>25 Q. Did you consider it, commercial sexual</p>
<p style="text-align: right;">Page 51</p> <p>1 list?</p> <p>2 A. The United Inn.</p> <p>3 Q. Do you understand that to mean that United</p> <p>4 Inn had the highest crime rate in Tucker precinct,</p> <p>5 of all the hotels in Tucker precinct?</p> <p>6 A. Yes, I can believe that, yes, of all of</p> <p>7 them, uh-huh.</p> <p>8 Q. Okay. And I -- I did want to just note</p> <p>9 here when it says "mission," a little bit below</p> <p>10 where you were just reading, the first section says</p> <p>11 "Who." And it -- it lists in the first line on to</p> <p>12 the second line DeKalb Narcotics/Vice. Do you see</p> <p>13 that?</p> <p>14 A. Yes.</p> <p>15 Q. Is that the unit that you were part of?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So were you part of this Operation</p> <p>18 Safeguard?</p> <p>19 A. Yes.</p> <p>20 Q. So Sergeant King, in your time working in</p> <p>21 the vice unit with DeKalb County Police Department,</p> <p>22 did you view the United Inn and Suites as a high</p> <p>23 crime hotel?</p> <p>24 A. Yes.</p> <p>25 Q. And was it your understanding that that</p>	<p style="text-align: right;">Page 53</p> <p>1 activity like prostitution and sex trafficking, to</p> <p>2 be a problem at the United Inn and Suites from 2015</p> <p>3 to 2021?</p> <p>4 A. Yes.</p> <p>5 Q. We've talked about a handful of reports</p> <p>6 today. Do you believe, Sergeant King, that the only</p> <p>7 women who are involved in commercial sexual activity</p> <p>8 at the United Inn and Suites are the women who were</p> <p>9 in those reports, or do you believe that there were</p> <p>10 other women involved in such acts at the hotel who</p> <p>11 were not included in those reports?</p> <p>12 A. Other women --</p> <p>13 MR. STORY: Objection.</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q. Go ahead, Sergeant.</p> <p>16 A. Other women, there are other women and kids</p> <p>17 and all that that has not been involved -- that has</p> <p>18 not been in the reports, that has not been recorded,</p> <p>19 so, yes, others.</p> <p>20 Q. And why do you say that, Sergeant King?</p> <p>21 A. Because you can't catch every crime. And,</p> <p>22 you know, you try your best, but you're going to</p> <p>23 miss a couple as you try to compress or, you know,</p> <p>24 move these people out, but it's -- it's -- it's</p> <p>25 several more. Some of them are scared, they</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 54</p> <p>1 can't -- they're not going to come and talk. You  2 got to be standing right there in front of you when  3 the police is there. So there are several.  4 Q. Is it fair to say that you couldn't spend  5 all your time just at the United Inn and Suites, you  6 had to go to other businesses and properties too to  7 police crime?  8 A. Yes.  9 Q. Sergeant King, in the course of your work  10 in the vice unit, where you would go on websites  11 like Backpage and Listcrawler, did you see  12 advertisements for women who you believe to be  13 minors, that is, under the age of 18?  14 MR. STORY: Object to form.  15 A. Repeat the question.  16 BY MR. BOUCHARD:  17 Q. When you were working the vice unit, you  18 said that you would go on websites like Backpage and  19 Listcrawler; correct?  20 A. Yes.  21 Q. And when you were on those websites, did  22 you occasionally see advertisements for women who  23 you believed to be under the age of 18, that is,  24 minors?  25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 THE VIDEOGRAPHER: Back on the video record  2 at 11:55 a.m.  3 EXAMINATION  4 BY MR. STORY:  5 Q. All right, Sergeant King. We met earlier.  6 My name is Will Story, and I represent Northbrook  7 Industries. That's the entity that owns United Inn  8 and Suites. Now, I -- I get a second in this  9 deposition, so I'm going to go over a few things  10 that Mr. Bouchard went over with you earlier.  11 There's going to be a lot of times that just for  12 efficiency purposes I'm going to be reading you part  13 of the report and just -- I'm going to ask you  14 correct? Because we're over a video, you're going  15 to know a lot of the times the answer to my  16 question. If you can, for our court reporter, just  17 do your best to let me finish and then answer so we  18 can create a clean record. All right?  19 A. Yes.  20 Q. You mentioned in the beginning of your  21 deposition you've been with DeKalb County for 14  22 years, eight of those were in the -- the vice unit.  23 What did you do prior to the vice unit?  24 A. I was on a NET team, the human -- I mean,  25 sorry, the task force unit for four years; and prior</p>
<p style="text-align: right;">Page 55</p> <p>1 MR. STORY: Object to form.  2 BY MR. BOUCHARD:  3 Q. Do you believe that some of those women  4 worked in commercial sexual activity at the United  5 Inn and Suites?  6 A. Yes.  7 MR. STORY: Object to form.  8 BY MR. BOUCHARD:  9 Q. Sergeant King, thank you very much for your  10 time today. I think those are all the questions I  11 have for you, sir. Will Story, who is also on the  12 phone or on the video, may have additional questions  13 for you.  14 A. Thank you.  15 MR. STORY: Thank you, Mr. Bouchard. Good  16 morning, Sergeant King. If you don't mind, I've got  17 to use the restroom. If we can take a quick  18 two-minute break, and I'll -- I'll get through this  19 as efficiently as possible. Is that all right with  20 you?  21 THE WITNESS: Yes, sir.  22 MR. STORY: Thank you.  23 THE VIDEOGRAPHER: Going off the video  24 record 11:50 a.m.  25 (Recess 11:50 to 11:55 a.m.)</p>	<p style="text-align: right;">Page 57</p> <p>1 to that, I was in a uniformed patrol capacity.  2 Q. Okay. So -- and what is that for the four  3 years? Was it task force unit you said?  4 A. Yes.  5 Q. What were the responsibilities of the task  6 force units?  7 A. Target the high crime areas and try to, you  8 know, compress the crime from the high target area.  9 Q. Okay. And fair to say, I know this isn't  10 an exhaustive list, but basically the DeKalb County  11 police vice unit was responsible for prostitution,  12 illegal gambling, and human trafficking?  13 A. Yes. And county ordinance with reference  14 to businesses.  15 Q. Okay. Sergeant King, if you can, explain  16 to the jury what -- what's the difference between  17 prostitution and human trafficking?  18 A. Prostitution is soliciting yourself for  19 sexual favors and receiving monetary gifts for it.  20 And human trafficking is when you're trafficking  21 somebody from state lines, or you can traffic them  22 from -- it can get technical as far as even having a  23 condom, couple of condoms in your possession and  24 transporting that female or male subject, and that  25 could potentially be human trafficking as well,</p>

## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 66</p> <p>1 A. Yeah, the Budget -- which one?</p> <p>2 Q. That one on 5075 Memorial.</p> <p>3 A. Did I do Budgetel? I can't remember if I</p> <p>4 did Budgetel. No, I didn't do Budgetel on Memorial.</p> <p>5 I haven't had a case in Budgetel on Memorial. I had</p> <p>6 a lot of cases in United Inn. We had a lot of cases</p> <p>7 there. Maybe another detective may had Budget Inn,</p> <p>8 but I didn't catch one out of there.</p> <p>9 Q. Okay. You were talking about earlier that</p> <p>10 you could perform a, like, search filter on Backpage</p> <p>11 that could get you to a general location. Do you</p> <p>12 remember that?</p> <p>13 A. Absolutely, yes.</p> <p>14 Q. Do you know if that filter was only</p> <p>15 available to you as a police officer or if that was</p> <p>16 available to everyone in the general public using</p> <p>17 that website?</p> <p>18 A. Everyone in the general public can type it</p> <p>19 in. If you know how to navigate through the</p> <p>20 Backpage.com at the time, you could utilize it.</p> <p>21 Q. And would you know an exact -- this is</p> <p>22 going to be the wrong phrase, but like an exact</p> <p>23 geographic area that you were focusing on when you</p> <p>24 would filter those search results?</p> <p>25 A. At that time, yes, I did. If I'm working</p>	<p style="text-align: right;">Page 68</p> <p>1 the Motel 6, that's another one. And right across</p> <p>2 the expressway from Masters Inn and Motel 6 is</p> <p>3 another hotel called American Best Suites, and</p> <p>4 that's another hotel.</p> <p>5 (Mr. Story dropped from Zoom.)</p> <p>6 THE VIDEOGRAPHER: Off the video record at</p> <p>7 12:11 p.m.</p> <p>8 (Off-the-record discussion.)</p> <p>9 THE VIDEOGRAPHER: Back on the video record</p> <p>10 at 12:12 p.m.</p> <p>11 BY MR. STORY:</p> <p>12 Q. Sergeant King, we -- we were discussing the</p> <p>13 other hotels in the north central precinct, and you</p> <p>14 mentioned Motel 6, Masters Inn, and American Best</p> <p>15 Suites. My question was, did you make any -- or do</p> <p>16 you recall making any arrests for prostitution or</p> <p>17 sex trafficking from 2015 to 2021 at any of those</p> <p>18 hotels?</p> <p>19 A. Yes, absolutely.</p> <p>20 Q. Okay.</p> <p>21 A. Several arrests.</p> <p>22 Q. All right. I'm going to share my screen</p> <p>23 quickly and -- and go over a few of these incident</p> <p>24 reports.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 67</p> <p>1 in -- DeKalb County is broken down with four</p> <p>2 different precincts. You have the north, east,</p> <p>3 south, the north central and -- that's what, four --</p> <p>4 north central -- north central, south, east, and</p> <p>5 Tucker precinct area. So if we're going to work in</p> <p>6 a -- let's just throw up one of them, probably work</p> <p>7 in the east precinct area, in that geographical</p> <p>8 format of where east is located at, I would type an</p> <p>9 address, I would type a street name in that area so</p> <p>10 we can focus in that area.</p> <p>11 Q. What precinct is United Inn and Suites in?</p> <p>12 A. That's north central, yes. That's the</p> <p>13 north central precinct.</p> <p>14 Q. When you were going over that -- those</p> <p>15 other problem hotels, any of those in the north</p> <p>16 central precinct that you can recall?</p> <p>17 A. Say it again.</p> <p>18 Q. -- is that in the north central precinct?</p> <p>19 Masters Inn?</p> <p>20 A. You started breaking up. Repeat it?</p> <p>21 Q. Masters Inn?</p> <p>22 A. Masters Inn? Masters Inn is -- yes, that's</p> <p>23 north central.</p> <p>24 Q. Okay.</p> <p>25 A. Yes. And right across from Masters Inn is</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Give me one second. You see this police</p> <p>2 report, Sergeant King?</p> <p>3 A. Yes.</p> <p>4 Q. And you and Mr. Bouchard -- Bouchard have</p> <p>5 already gone over this, but I just wanted to ask you</p> <p>6 a few questions. You see August 12th, 2015, 2:00</p> <p>7 p.m.?</p> <p>8 A. Yes.</p> <p>9 Q. All right. And I'm going to scroll down.</p> <p>10 Here is the assailant's information. Look like it's</p> <p>11 a Tonisha Smith. And is she -- she's 23 years old;</p> <p>12 is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. All right. And -- and you'll recall, I'm</p> <p>15 not going to have you reread it, but if you want to,</p> <p>16 just -- just let me know. This is the one where you</p> <p>17 and Officer Schofield came in -- is Officer</p> <p>18 Schofield a female?</p> <p>19 A. Yes.</p> <p>20 Q. And y'all kind of had the story of we're</p> <p>21 doing -- we're a couple, we're doing this for your</p> <p>22 birthday? Does that refresh your recollection?</p> <p>23 A. Yes.</p> <p>24 Q. Right. So talking about Ms. Smith, the</p> <p>25 female that ends up being arrested for prostitution,</p>



## A.G. Vs. Northbrook Industries

<p style="text-align: right;">Page 90</p> <p>1 Mr. Story just asked you, but I'll be done here very  2 soon. Okay, sir? Do you need to take a break, or  3 are you good?  4 THE WITNESS: No, go ahead. That's cool.  5 FURTHER EXAMINATION  6 BY MR. BOUCHARD:  7 Q. Okay. So I wanted to clarify, Sergeant  8 King, do you recall having any conversations at any  9 time whatsoever with hotel staff or employees at the  10 United Inn and Suites?  11 A. No.  12 Q. Okay. You simply do not recall ever  13 talking to hotel employees there. Is that true?  14 A. True.  15 Q. Okay. Is that something that, typically  16 speaking, Sergeant, uniformed DeKalb County Police  17 Department officers would have been doing, not  18 undercover officers like yourself?  19 A. Correct.  20 Q. You mentioned that you participated in some  21 discussions with some hotels about what those hotels  22 could do to address human trafficking and  23 prostitution activity; is that right?  24 A. Yes.  25 Q. Is one of the things that they can do</p>	<p style="text-align: right;">Page 92</p> <p>1 that run a hotel?  2 A. Absolutely. Everybody take part so  3 everybody can see things, everybody know, so yes.  4 Q. And if I've understood you correctly,  5 Sergeant King, you're saying you don't ever recall  6 the United Inn and Suites asking the DeKalb County  7 Police Department for training on how to combat sex  8 trafficking at the hotel or prostitution at the  9 hotel? Do you recall?  10 A. Correct. Never asked.  11 Q. You also stated today that you can steer  12 activity -- Sergeant King, are you still there?  13 A. I'm here.  14 Q. Okay.  15 MR. BOUCHARD: I just got a notice saying  16 my Internet connection is unstable. Can you guys  17 hear me okay?  18 THE REPORTER: Yeah. You were breaking up  19 a little bit, but it's clear at the moment.  20 BY MR. BOUCHARD:  21 Q. Okay. Sergeant King, I've heard you say  22 today that sex for money, commercial sex activity  23 was common at the United Inn and Suites from 2015 to  24 2021 when you were in the DeKalb vice unit; is that  25 correct?</p>
<p style="text-align: right;">Page 91</p> <p>1 training their staffs?  2 A. Absolutely. Training they staff, get with  3 people like me to give them expertise, advice on how  4 to do things, setting up meetings so we can go over  5 what they can do and -- and maybe host a meeting  6 with they staff, stuff like that. But they need to  7 reach out as a business owner to us if they really  8 want to -- you know, to combat the crime of human  9 trafficking, or sex trafficking.  10 Q. Is that something that the DeKalb County  11 Police Department would have provided for free to  12 the United Inn if the United Inn had reached out to  13 DeKalb County requesting training for its employees?  14 A. Absolutely, absolutely. In that case, that  15 would be something like I would have came out and  16 did it, yes, absolutely.  17 Q. And is that a training that you would have  18 provided to all staff at the hotel, or is there just  19 to the manager, or who -- who would you have  20 trained, Sergeant?  21 A. Well, it depends on the -- the owners or  22 the managers of the hotel. But it would be  23 beneficial for all the staff to be present.  24 Q. Are you including, then, housekeeping,  25 front desk, maintenance, or all the different layers</p>	<p style="text-align: right;">Page 93</p> <p>1 A. Yes.  2 Q. At any given point in time, Sergeant King,  3 how many women would you estimate were working at  4 the hotel in commercial sexual activity during that  5 time period?  6 A. Ooh, several. I could say probably  7 approximately, well over -- well over 20, well over  8 20.  9 Q. Sergeant King, do you have an opinion as to  10 whether or not the hotel knew that commercial sexual  11 activity was occurring on the property?  12 A. Based on my knowledge and training and  13 experience on that, the hotel should have known,  14 especially the narcotic situations from drug  15 activity, they should, by walking around and seeing  16 the activity of people loitering in the back of the  17 complex, they should have some knowledge of  18 something.  19 Some hotels been doing it for so -- a long  20 period of time that when a pimp gets a room, he or  21 she normally gets three or four rooms, so they --  22 what they're doing, they generating revenue for them  23 as well, so they -- they try to look the other way  24 in reference to what's really going on to keep the  25 revenue up, keep the rooms booked.</p>